

REMARKS**Claim Objections**

The Examiner has objected to claims 24, 29, 32, 33, 35, and 37 due to informalities. Applicant has corrected the informalities and respectfully requests the Examiner remove the objections to claims 24, 29, 32, 33, 35, and 37.

Claim Rejections – 35 U.S.C. § 112

The Examiner has rejected claims 24, 38, 41, and 48 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicant has clarified the statements in question using more specific language as was requested by the Examiner. The specification and claims referring to this language has been amended. No new matter has been added. Therefore, Applicant respectfully requests the Examiner to remove the 35 U.S.C. §112, first paragraph, rejection of claims 24, 38, 41, and 48.

Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 24-33 and 35-48 under 35 U.S.C. §103(a), as being unpatentable over Williams et. al. (U.S. Patent No. 6,199,151) (“Williams”). For the reasons set forth below, Applicant asserts that the cited references fail to teach, suggest, or render obvious Applicant’s invention as claimed in claims 24-33 and 35-48.

Williams discloses an apparatus and method for selecting a row of memory devices. (Williams abstract) Williams further teaches that an advantage of the disclosed embodiments is to reduce the amount of time required to select a device row in response

to a virtual address. (Williams, column 2, lines 43-45) Williams apparatus is specific to a device that operates during normal system operation after boot up.

With respect to independent claim 24 in the presently claimed invention, Applicant teaches and claims:

“An apparatus comprising a controller, before controller initialization in response to a power-up or a soft reset of the apparatus, configured to generate an unencoded chip select word in response to a default unencoded chip select mode, an encoded chip select word in response to a default encoded chip select mode; and wherein the encoded chip select word and the unencoded chip select word select the same boot device.” (Claim 24) (Emphasis added)

Applicant asserts that Williams does not do not teach, suggest, or render obvious Applicant's invention as claimed in claim 24 because the Williams device does operate before or during system initialization after a system power-up or after a system soft reset. The Examiner specifically states this in the office action mailed on November 2, 2006: “Williams does not expressly disclose that the memory device stores the code to initializing the system.” (page 6 of Examiner's office action). Furthermore, contrary to Examiner's suggestion that it is well known in the art that memory devices are used for such purposes, Williams expressly teaches away from this possibility. Specifically, Williams uses an example of a BIOS, an additional device unnecessary in Applicant's invention for functionality, to perform system initialization routines such as generating an unencoded or encoded chip select word: “[a]t startup time, initialization program code (e.g., in a basic input output service (BIOS) device) is executed to determine the memory

mapping of each of the device rows in the memory subsystem and to program respective top-of-memory values for the device rows into configuration registers in the row decoder.” (Williams, column 5, lines 43-48)

Thus, Applicant submits that Williams does not teach a device to perform generating an encoded and unencoded chip select word prior to initialization during power-up or soft reset, but additionally, the device in Williams does not suggest or render obvious Applicant’s invention because Williams specifically suggests that another device, namely a BIOS is utilized to perform a configuration routine. The BIOS, being external and apart from the controller, would be a detriment if it were to be required to have the added functionality in question. Even so, Williams suggests the BIOS would be the location of any initialization routines and, thus, teaches away from combining the initialization functionality in the BIOS with the controller into one integrated unit that can generate an encoded and unencoded chip select word prior to initialization during power-up or soft reset. Thus, Applicant respectfully submits that Williams does not teach, suggest, or render obvious Applicant’s invention as claimed in pending independent claim 24.

In regard to independent claims 38, 41, and 47, Applicant respectfully submits that Williams does not teach, suggest, or render obvious Applicant’s invention at least for the same reasons as independent claim 24. Again, Williams does not teach at least generating an encoded and unencoded chip select word prior to initialization during power-up or soft reset. Thus, Applicant respectfully submits that Williams does not teach, suggest, or render obvious independent claims 38, 41, and 47 of the presently claimed invention.

Claims 25-33, 35-37, 39-40, 42-46, and 48 depend from and further limit independent claims 38, 41, and 47, respectively. Thus, for at least the same reasons advanced above with respect to independent claims 38, 41, and 47, Applicant respectfully submits that Williams does not teach, suggest, or render obvious claims 25-33, 35-37, 39-40, 42-46, and 48.

Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 24-33 and 35-48.

CONCLUSION

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 50-0221. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Cyndi M. Wheeler at (916) 356-5358.

Respectfully Submitted,

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